

1 QUIN DENVER, Bar #49374
2 Federal Defender
3 RACHELLE BARBOUR, Bar #185395
4 Assistant Federal Defender
5 801 I Street, 3rd Floor
6 Sacramento, California 95814
7 Telephone (916) 498-5700

8 Attorney for Defendant
9 JOSE DELGADO-RODRIQUEZ

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,) Case No. CR.S-05-101-GEB
14 Plaintiff,)
15 v.) **STIPULATION AND ORDER**
16 JOSE DELGADO-RODRIQUEZ,) DATE: June 17, 2005
17 Defendant.) TIME: 9:00 a.m.
18) JUDGE: Hon. Garland E. Burrell, Jr.
19)
20)
21)
22)
23)

24 It is hereby stipulated and agreed to between the United States of
25 America through JASON HITT, Assistant U.S. Attorney, and defendant,
26 JOSE DELGADO-RODRIQUEZ, by and though his counsel, RACHELLE BARBOUR,
27 Assistant Federal Defender, that the status conference set for June 3,
28 2005 be vacated and a further status conference be set for Friday, June
17, 2005 at 9:00 a.m.

29 This continuance is being requested because defense counsel is
30 discussing the plea agreement with Mr. Delgado-Rodriguez and the
31 government. The parties are continuing to negotiate the plea
32 agreement. Further, defense counsel expects to go out on maternity
33 leave shortly and needs time to reassign the case to another attorney
34 in her office.

The parties request that speedy trial time be excluded from the date of this order through the date of the status conference set for June 17, 2005, pursuant to 18 U.S.C. §§ 3161 (h) (8) (B) (iv) [preparation of counsel] (Local Code T4).

DATED: June 2, 2005.

Respectfully submitted,

QUIN DENVIR
Federal Defender

/s/ Rachelle Barbour

RACHELLE BARBOUR
Assistant Federal Defender
Attorney for Defendant
JOSE DELGADO-RODRIQUEZ

McGREGOR SCOTT
United States Attorney

DATED: June 2, 2005.

/s/ Rachelle Barbour for
JASON HITT
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED.

Dated: June 2, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge